

HAGENS BERMAN SOBOL SHAPIRO LLP

Steve W. Berman, Esq. (*pro hac vice*)
 steve@hbsslaw.com
 Stephanie A. Verdoia, Esq. (*pro hac vice*)
 stephaniev@hbsslaw.com
 1301 Second Avenue, Suite 2000
 Seattle, WA 98101
 Telephone: (206) 623-7292
 Facsimile: (206) 623-0594

Rio S. Pierce, Esq. (*pro hac vice*)
 riop@hbsslaw.com
 Abby R. Wolf, Esq. (*pro hac vice*)
 abbyw@hbsslaw.com
 Hannah K. Song, Esq. (*pro hac vice*)
 hannahso@hbsslaw.com
 715 Hearst Ave, Suite 300
 Berkeley, CA 94710
 Telephone: (510) 725-3000
 Facsimile: (510) 725-3001

PANISH SHEA BOYLE RAVIPUDI LLP

Brian J. Panish, NV Bar No. 16123
 panish@psbr.law
 Rahul Ravipudi, NV Bar No. 14750
 rravipudi@psbr.law
 Adam Ellis, NV Bar No. 14514
 aellis@psbr.law
 Ian Samson, NV Bar No. 15089
 isamson@psbr.law
 300 S. Fourth Street, Suite 710
 Las Vegas, NV 89101
 Telephone: (702) 560-5520
Counsel for Plaintiffs and the Proposed Class

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

RICHARD GIBSON, and HERIBERTO
 VALIENTE, *on behalf of themselves and
 others similarly situated,*

Plaintiffs,

v.

MGM RESORTS INTERNATIONAL,
 CENDYN GROUP, LLC, THE
 RAINMAKER GROUP UNLIMITED, INC.,
 CAESARS ENTERTAINMENT INC.,
 TREASURE ISLAND, LLC, WYNN
 RESORTS HOLDINGS, LLC,

Defendants.

Case No. 2:23-CV-140-MMD-DJA

**EXHIBIT D TO PLAINTIFFS' MOTION
 TO APPOINT HAGENS BERMAN
 SOBOL SHAPIRO LLP AND PANISH
 SHEA BOYLE RAVIPUDI LLP AS
 INTERIM CLASS COUNSEL**

EXHIBIT D

PROPOSED ORDER

[PROPOSED] ORDER

Case No. 2:23-cv-00140

2023-02-17 _Proposed_ Order(2185014.1) v3docx 3/30/2023

HAGENS BERMAN

1301 Second Avenue, Suite 2000, Seattle, WA 98101

(206) 623-7292 OFFICE (206) 623-0594 FAX

HAGENS BERMAN SOBOL SHAPIRO LLPSteve W. Berman, Esq. (*pro hac vice*)

steve@hbsslaw.com

Stephanie A. Verdoia, Esq. (*pro hac vice*)

stephaniev@hbsslaw.com

1301 Second Avenue, Suite 2000

Seattle, WA 98101

Telephone: (206) 623-7292

Facsimile: (206) 623-0594

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riop@hbsslaw.com

Abby R. Wolf, Esq. (*pro hac vice*)

abbyw@hbsslaw.com

Hannah K. Song, Esq. (*pro hac vice*)

hannahso@hbsslaw.com

715 Hearst Ave, Suite 300

Berkeley, CA 94710

Telephone: (510) 725-3000

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Brian J. Panish, NV Bar No. 16123

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Rahul Ravipudi, NV Bar No. 14750

rravipudi@psbr.law

Adam Ellis, NV Bar No. 14514

aellis@psbr.law

Ian Samson, NV Bar No. 15089

isamson@psbr.law

300 S. Fourth Street, Suite 710

Las Vegas, NV 89101

Telephone: (702) 560-5520

*Counsel for Plaintiffs and the Proposed Class***UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**RICHARD GIBSON, and HERIBERTO
VALIENTE, *on behalf of themselves and
others similarly situated,*

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MGM RESORTS INTERNATIONAL,
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Case No. 2:23-CV-140-MMD-DJA

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' MOTION TO APPOINT
HAGENS BERMAN SOBOL SHAPIRO
LLP AND PANISH SHEA BOYLE
RAVIPUDI LLP AS INTERIM CLASS
COUNSEL**

[PROPOSED] ORDER

Case No. 2:23-cv-00140

2023-02-17 _Proposed_Order(2185014.1) v3docx 3/30/2023

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1 Now before the Court is the Plaintiffs' Motion to Appoint Hagens Berman Sobol Shapiro
2 LLP and Panish Shea Boyle Ravipudi LLP as Interim Class Counsel.

3 The Court has carefully reviewed the motion and concludes that Hagens Berman Sobol
4 Shapiro LLP and Panish Shea Boyle Ravipudi LLP should be appointed, and are hereby
5 appointed, as Interim Class Counsel for the Proposed Class. The Court concludes that such
6 appointment will aid in achieving efficiency and economy in what is likely to be expensive and
7 complicated litigation, and that such appointment will enhance fairness to all parties concerned,
8 as well as the proposed class.

9 In reaching these conclusions, the Court has carefully reviewed the motion and its
10 accompanying submissions, including the declaration and attachments submitted on behalf of the
11 appointed firms, and has also considered the factors outlined in Rule 23(g) of the Federal Rules
12 of Civil Procedure and other authority cited by the Plaintiffs. The Plaintiffs' submission
13 demonstrates that the appointed firms satisfy the requirements of Rule 23(g) for appointment as
14 interim class counsel. This includes the work counsel has done in identifying or investigating
15 potential claims in the action; counsel's experience in handling class actions, other complex
16 litigation, and the types of claims asserted in the action; counsel's knowledge of the applicable
17 law; and the resources that counsel has available and will commit to representing the class.

18 Therefore, with respect to the Proposed Class, Hagens Berman Sobol Shapiro LLP and
19 Panish Shea Boyle Ravipudi LLP as Interim Class Counsel, shall have authority over the
20 following matters on behalf of the Proposed Class:

- 21 a. convening meetings of Plaintiffs' counsel;
- 22 b. the initiation, response, scheduling, briefing, and argument of all motions;
- 23 c. the scope, order, and conduct of all discovery proceedings;
- 24 d. making such work assignments as among themselves and other Plaintiffs'
25 counsel as they may deem appropriate;
- 26 e. collecting time and expense reports from all Plaintiffs' counsel on a
27 periodic basis;

1 f. the retention of experts;
2 g. the designation of which Plaintiffs' attorneys shall appear at hearings and
3 conferences with the Court;
4 h. settlement negotiations and agreements with Defendants;
5 allocate among counsel any award of attorney's fees and expenses; and
6 i. all other matters concerning the prosecution of the Action on behalf of the
7 Proposed Class.

8 **IT IS SO ORDERED:**

9 _____
10 UNITED STATES DISTRICT JUDGE

11 Dated: _____
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